

**PRESENTMENT DATE: NOVEMBER 1, 2019**

**PRESENTMENT TIME: 10:00 A.M.**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE CHRISTIAN BROTHERS' INSTITUTE, *et al.*,  
  
*Reorganized Debtors.*

Chapter 11

Case No. 11-22820 (RDD)

(Jointly Administered)

**NOTICE OF PRESENTMENT OF REORGANIZED DEBTORS' AND  
PARTICIPATING PARTIES' MOTION PURSUANT TO SECTION 350  
OF THE BANKRUPTCY CODE, BANKRUPTCY RULE 5010 AND LOCAL  
RULE 5010-1 TO REOPEN THE CHAPTER 11 CASES OF THE REORGANIZED  
DEBTORS' FOR THE LIMITED PURPOSE OF (I) CONSIDERING THE  
REORGANIZED DEBTORS' MOTION TO ENFORCE THE PLAN AND  
CONFIRMATION ORDER, INCLUDING THE DISCHARGE AND  
INJUNCTION PROVISIONS, AND (II) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on November 1, 2019 at 10:00 a.m. (EST), the attached motion of The Christian Brothers' Institute and The Christian Brothers of Ireland, Inc. (collectively, the "Reorganized Debtors") and All Hallows Institute and The Edmund Rice Christian Brothers North American Province of the Christian Brothers (together, with All Hallows Institute, the "Participating Parties") Pursuant to Section 350 of the Bankruptcy Code, Bankruptcy

Rule 5010 and Local Rule 5010-1 to Reopen the Chapter 11 Cases of the Reorganized Debtors for the Limited Purpose of (I) Considering the Reorganized Debtors' and the Participating Parties' Motion to Enforce the Plan and Confirmation Order, including the Discharge and Injunction Provisions, and (II) Granting Related Relief (the "Motion") will be presented to the Honorable Robert D. Drain, Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of New York (the "Court"), at 300 Quarropas Street, White Plains, New York 10601, for approval and signature.

**PLEASE TAKE FURTHER NOTICE** that responses or objections, if any, to the relief requested in the Motion must: (a) be in writing; (b) be filed with the Clerk of the Bankruptcy Court in accordance with the standing general order of the Bankruptcy Court for the Southern District of New York entered on January 19, 2001, establishing procedures for electronic filing, and be received in the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601; (c) be served upon (i) the undersigned attorneys for the Reorganized Debtors and the Participating Parties; (ii) the Office of the United States Trustee, Southern District of New York, U.S. Federal Building, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: Paul K. Schwartzberg, Esq.; and (iii) Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 36<sup>th</sup> Floor, New York, New York 10017, Attn: James I. Stang, Esq./Ilan D. Scharf, Esq., counsel for the Official Committee of Unsecured Creditors with a copy to the Chambers of the Honorable Robert D. Drain, so as to all be received no later than October 25, 2019.

**PLEASE TAKE FURTHER NOTICE** that if a written Objection is timely filed and served, a hearing will be scheduled and held to consider the Motion before the Honorable Robert D. Drain in the Bankruptcy Court.

**PLEASE TAKE FURTHER NOTICE** that if no Objections to the Motion are received by the Objection Deadline, the Reorganized Debtors and the Participating Parties may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice.

Dated: New York, New York  
October 7, 2019

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